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8 ROBERT R VELA  
9 SANDY E VELA

10 UNITED STATES BANKRUPTCY COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 In re:

Case No. 19-52094

14 ROBERT R VELA  
15 SANDY E VELA,

Chapter 13

16 Debtors.

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18 **MOTION TO EXTEND TIME IN WHICH TO FILE**  
19 **SCHEDULES AND RELATED DOCUMENTS**

20 Robert R Vela & Sandy E Vela, Debtors, apply to the Court for an Order Extending Time in  
21 Which to File Schedules and Related Documents. In support of the Motion, Debtors represent as  
22 follows:

23 1. The debtors filed their Voluntary Petition under Chapter 13 of the Bankruptcy Code  
24 on October 15, 2019. The filing was done as a “skeletal filing” to enjoin a foreclosure sale of  
25 Debtors’ residence and to reorganize other debts owed by Debtors.

26 2. The Court has set October 29, 2019 as the last day to file the Schedules and related  
27 documents.

28 3. Debtors, by their attorney, have been in contact with the beneficiaries of a deed of

1 trust secured by their residence regarding repayment options and/or bankruptcy treatment under  
2 Debtors' Chapter 13 Plan. Debtors have been focused on these negotiations and have not yet  
3 provided their attorney with the additional documents/information necessary to complete the  
4 schedules, statements and other documents required to be filed with the Court. Debtors have  
5 committed to providing the documents/information necessary to allow their Chapter 13 case to  
6 proceed.

7 4. Accordingly, Debtors respectfully request that the Court extend the time for filing the  
8 Schedules and related documents to November 12, 2019, by which time Debtors will have had  
9 sufficient time to confer with counsel and finalize the documents.

10 5. The meeting of creditors has not yet been scheduled.

11 Dated: October 28, 2019

DOUGHERTY & GUENTHER, APC

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13 /s/ Ralph P. Guenther  
14 RALPH P. GUENTHER  
15 Attorney for Debtors  
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